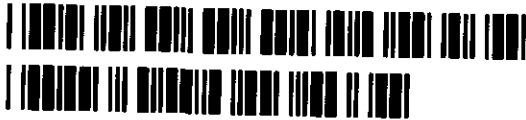


HONORABLE ROBERT S. LASNIK



10-CV-00828-RPT

FILED
LODGED
ENTERED
RECEIVED

JUL 06 2011

AT SEATTLE
CLERK U.S. DISTRICT COURT
BY WESTERN DISTRICT OF WASHINGTON
DEPUTY

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

RADIO SYSTEMS CORPORATION and
INNOTEK, INC.,

Plaintiffs,

v.

TOM LALOR, individually, and
BUMPER BOY, INC.,

Defendant.

Cause No. 2:10-cv-00828

STIPULATED MOTION AND [PROPOSED]
ORDER TO EXTEND DEADLINES

Noted: July 1, 2011

Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiffs Radio Systems Corporation and Innotech, Inc. ("Radio Systems") and Defendants Tom Lalor and Bumper Boy, Inc. ("Lalor") hereby jointly move to amend the Scheduling Order entered in this case to extend the deadlines for expert reports by one (1) month. Specifically, the parties respectfully seek to extend the dates for expert reports as follows:

<u>Event</u>	<u>Old Date</u>	<u>Proposed Date</u>
Opening Expert Reports	July 18, 2011	August 18, 2011
Responsive Expert Reports	August 17, 2011	September 19, 2011
Expert Witness Discovery Cutoff	September 6, 2011	October 6, 2011

In support of this Joint Motion, the parties state as follows:

1. The parties have been actively conducting discovery and have exchanged numerous documents, infringement contentions, non-infringement contentions, and invalidity contentions.
2. Plaintiffs recently, and voluntarily, produced certain documents to Defendants.
3. Defendants believe that their analysis of those documents may lead to fruitful settlement negotiations.
4. Defendants also believe that the current deadline for expert reports will not provide them with sufficient time for their expert to analyze and opine on those documents.
5. Plaintiffs consent to a 30-day extension of the expert disclosure deadline requested by Defendants.

WHEREFORE, for all of the reasons stated herein, Lalor and Radio Systems respectfully request that this Court issue an Order amending the Scheduling Order to extend the deadlines for expert reports in this case by one month.

A proposed order is submitted below.

Dated: July 1, 2011

Respectfully submitted:

/s/ Philip P. Mann

Philip P. Mann, WSBA No: 28860
MANN LAW GROUP
Seattle Tower
1218 Third Avenue, Suite 1809
Seattle, Washington 98101
(206) 436-0900
Fax (866) 341-5140
phil@mannlawgroup.com

/s/ Matthew Stark

Matthew Stark
R. Bradford Brittain
MERCHANT & GOULD P.C.
110 Tyson Boulevard
Suite 203
Alcoa, TN 37701
Telephone (865) 380.5989
Facsimile (865) 380.5999
MStark@merchantgould.com
rbrittain@merchantgould.com

1 John Whitaker, WSBA # 28868
2 WHITAKER LAW GROUP
3 Seattle Tower
4 1218 Third Avenue, Suite 1809
5 Seattle, WA 98101
6 (206) 436-8500
7 john@wlawgrp.com

8 Attorneys for Defendants,
9 Tom Lalor and Bumper Boy, Inc.


Duncan C. Turner
BAGDLEY MULLINS LAW GROUP PLLC
4750 Columbia Center
701 Fifth Avenue
Seattle, WA 98104
Telephone (206) 621-6566
Facsimile (206) 621-9686
duncanturner@bagdleymullins.com

Attorneys for Plaintiffs
Radio Systems Corporation and Innotek
Systems Inc.

10 **PROPOSED ORDER**

11 IT IS SO ORDERED.

12 Dated: July 6, 2011

13 
14 HON. ROBERT S. LASNIK
15 UNITED STATES DISTRICT JUDGE

16 Presented By:

17 John Whitaker, WSBA # 28868
18 WHITAKER LAW GROUP
19 Seattle Tower
20 1218 Third Avenue, Suite 1809
21 Seattle, WA 98101
22 (206) 436-8500
23 john@wlawgrp.com

24 Attorneys for Defendants,
25 Tom Lalor and Bumper Boy, Inc.